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10 **UNITED STATES DISTRICT COURT**
EASTERN DISTRICT OF CALIFORNIA

11 ROBERT RIVAS, } Case No. 1:22-cv-00815-JLT-BAM
12 Plaintiff, } STIPULATED MOTION AND
13 } ~~PROPOSED~~ ORDER FOR THIRD
14 vs. } EXTENSION OF TIME
15 KILOLO KIJAKAZI, Acting }
16 Commissioner of Social Security, }
17 Defendant. }
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21 IT IS HEREBY STIPULATED, by and between the parties through their
22 respective counsel of record, with the Court's approval, that Plaintiff shall have a
23 11-day extension of time, from February 13, 2023 to February 24, 2023, for
24 Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All
25 other dates in the Court's Scheduling Order shall be extended accordingly.

26 This is Plaintiff's third request for an extension of time. Good cause exists
27 for the requested extension. For the weeks of January 31, 2023 and February 6,
28 2023, Counsel currently has 32 merit briefs, and several letter briefs and reply

1 briefs. Additional time is needed to thoroughly brief this matter for the Court.
2 Lastly, Counsel for Plaintiff continues to be on partial leave, working limited hours
3 for the months of January through March of 2023 (with a possible extension).

4 Defendant does not oppose the requested extension. Counsel apologizes to
5 the Defendant and Court for any inconvenience this may cause.

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7 Respectfully submitted,

8 Dated: January 30, 2023 PENA & BROMBERG, ATTORNEYS AT LAW
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10 By: /s/ Jonathan Omar Pena
11 JONATHAN OMAR PENA
12 Attorneys for Plaintiff
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Dated: January 30, 2023 PHILLIP A. TALBERT
15 United States Attorney
16 MATHEW W. PILE
17 Associate General Counsel
18 Office of Program Litigation
Social Security Administration
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20 By: */s/ Caspar Chan
21 Caspar Chan
22 Special Assistant United States Attorney
23 Attorneys for Defendant
(*As authorized by email on Jan. 30, 2023)
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ORDER

Pursuant to stipulation and good cause appearing, Plaintiff shall have an 11-day extension of time to serve Defendant with Plaintiff's Motion for Summary Judgment. Plaintiff shall now serve his Motion for Summary Judgment on or before February 24, 2023.

IT IS SO ORDERED.

Dated: **January 31, 2023**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE